

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE**

**6851 N.E. Loop 820, Suite 300  
North Richland Hills, TX 76180-6608  
(817) 770-8500  
Fax (817) 770-8511**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**MICHAEL AARON PRITCHARD  
JOI LYNN PRITCHARD  
DEBTORS**

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§  
§

**Case No: 24-42560-MXM**

**Court Hearing:  
Thursday, March 20, 2025 at 8:30 AM**

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**NOTICE OF OBJECTION TO CLAIM FILED ON BEHALF OF  
PINNACLE CREDIT SERVICES  
(Court Claim No. 5)**

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Tim Truman, the Standing Chapter 13 Trustee has filed an objection to your claim in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.**

If you do not want the court to eliminate or change your claim, then on or before March 13, 2025, you or your lawyer must:

1. File with the court a written response to the objection, explaining your position, at: ELDON B. MAHON, U.S. COURTHOUSE, 501 W. 10TH ST., RM. 147, FORT WORTH, TX 76102-3643.
2. If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above;
3. You must also send a copy to: Tim Truman, Standing Chapter 13 Trustee, Attention: Staff Attorney, at: 6851 N.E. Loop 820, Suite 300, North Richland Hills, TX 76180-6608 and any other party entitled to notice under the Federal Rules of Bankruptcy Procedure.

**If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim.**

Respectfully submitted,

By: /s/ Angela D. Allen

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Tim Truman, Standing Chapter 13 Trustee, Bar # 20258000  
Angela Allen, Staff Attorney, Bar # 007869700  
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**Case No: 24-42560-MXM**

**Court Hearing:**

**Thursday, March 20, 2025 at 8:30 AM**

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**TRUSTEE'S OBJECTION TO PROOF OF CLAIM FILED ON BEHALF OF  
PINNACLE CREDIT SERVICES  
(Court Claim No. 5)**

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**TO THE HONORABLE MARK X MULLIN, U.S. BANKRUPTCY JUDGE:**

Comes now **Tim Truman, Standing Chapter 13 Trustee, Movant** herein, and pursuant to Bankruptcy Rule 3007 files this his "Trustee's Objection to Proof of Claim Filed on Behalf of PINNACLE CREDIT SERVICES" ("CREDITOR") (Court Claim # 5), and would respectfully show the Court as follows:

1. The Trustee files this Objection pursuant to 11 U.S.C. §502(b)(1) and Bankruptcy Rules 3002 and 3007, and pursuant to Texas Civil Practice and Remedies Code §16.004(3).

2. Debtors filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code on or about July 24, 2024. Debtors' Chapter 13 Plan has been confirmed.

3. CREDITOR filed a Proof of Claim # 5, ("the claim") on or about 07/31/2024 relating to account number ending in 6304, in the amount of \$7,979.23.

4. Pursuant to the supporting documents attached to Claim, CREDITOR is assignee of ORIGINAL CLAIMANT Citi Bank.

5. On information and belief, under Texas Civil Practice & Remedies Code Ann. §16.004(1)(3), the debt asserted by CREDITOR is barred by the statute of limitations.

6. Pursuant to 11 U.S.C. §502(b)(1), the claim should be disallowed in its entirety because it is unenforceable against the Debtors.

**WHEREFORE, PREMISES CONSIDERED**, the Trustee prays that the Court **DISALLOW** Claim No. 5 of CREDITOR, and for such other and further relief to which he may show himself justly entitled.

Respectfully submitted,

By: /s/ Angela D. Allen

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Tim Truman, Bar # 20258000  
Standing Chapter 13 Trustee  
Angela Allen, Bar # 007869700  
Staff Attorney  
OFFICE OF THE STANDING CHAPTER 13 TRUSTEE  
6851 N.E. Loop 820, Suite 300  
North Richland Hills, TX 76180-6608  
(817) 770-8500

**NOTICE OF HEARING**

Any opposition to the Trustee's Objection to Claim not resolved will be heard by the Court on **March 20, 2025 at 8:30 AM** in Court Room 128, 501 West Tenth Street, Fort Worth, TX or by WebEx at <https://us-courts.webex.com/meet/Mullin>, Meeting ID: 2310 650 8783 (for Telephone Dial-In 1-650-479-3207).

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing "**Trustee's Objection to Proof of Claim Filed on Behalf of PINNACLE CREDIT SERVICES**" was served on the parties listed below in the manner listed below on or before February 11, 2025:

**BY FIRST CLASS MAIL:**

MICHAEL AARON PRITCHARD, JOI LYNN PRITCHARD, 3926 WENTWORTH DR, ARLINGTON, TX 76001-0000  
PINNACLE CREDIT SERVICES, ATTN: OFFICER/PRESIDENT; RESURGENT CAPITAL SERVICES, PO BOX 10587, GREENVILLE, SC 29603

**ELECTRONIC SERVICE:**

BRYEANS AND GARCIA PLLC, 5001 S COOPER ST #209, ARLINGTON, TX 76017  
MCCARTHY AND HOLTHUS, 1255 W 15TH ST #1060, PLANO, TX 75075  
LINEBARGER GOGGAN BLAIR & SAMPSON LLP, 3500 MAPLE AVE #800, DALLAS, TX 75219  
United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242

24-42560-MXM

MICHAEL AARON PRITCHARD & JOI LYNN PRITCHARD

Notice of Objection to Claim and Trustee's Objection to Proof of Claim

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/s/ Angela D. Allen

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Tim Truman, Angela Allen